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10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE DISTRICT OF ARIZONA

12 United States of America,

13 Plaintiff,

14 vs.

15 Abdul Malik Abdul Kareem,

16 Defendant.

CR-15-707-PHX-SRB (MHB)

**SUPPLEMENTAL NOTICE OF INTENT
TO INTRODUCE EXPERT WITNESS
TESTIMONY**

19 The United States of America, by and through counsel undersigned, hereby
20 provides supplemental notice that it may introduce certain evidence pursuant to Rule 702
21 of the Federal Rules of Evidence at the trial of this matter. Pursuant to Rule 16(a)(1)(G)
22 of the Federal Rules of Criminal Procedure, the United States supplement's its notice of
23 intent to use expert witness testimony under Rules 702, 703, or 705 of the Federal Rules
24 of Evidence during its case-in-chief and/or in rebuttal at trial. The United States names
25 below two additional subject matter experts on the global jihadist movement. Their
26 expert testimony is similar in nature to that of William Braniff and J.M. Berger listed
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1 previously on October 19, 2015. (Doc. 103.) As the government has notified the
2 defense, J.M. Berger will not be called to testify in the government's case.

- 3 1. **Lorenzo Vidino, Director of Program on Extremism, Center for Cyber and**
4 **Homeland Security, George Washington University**
- 5 2. **Evan Kohlmann, Chief of Research and Development at Flashpoint Global**
Partners

6 The United States intends to introduce expert testimony from Lorenzo Vidino and
7 Evan Kohlmann. Mr Vidino and Mr. Kohlmann will provide background information on
8 organizations within the global jihadist movement, to include the relationship between
9 ISIL, ISIS, the ai-Qai'ida organization and ai-Qa-ida in the Arabian Peninsula (AQAP).
10 Mr Vidino and Mr. Kohlmann will explain some of the processes by which individuals in
11 foreign countries with seemingly little connection to jihadist fronts in place like Syria or
12 Afghanistan became mobilized. Mr Vidino and Mr. Kohlmann will discuss the role of
13 Anwar ai-Awlaki, an American citizen who became the leading English language
14 ideologue for the global jihadist movement. Mr Vidino and Mr. Kohlmann will also
15 discuss the role of other ideologues for the global jihadist movements. Mr. Braniff will
16 testify about the specific vocabulary used by Kareem and his co-conspirators to
17 describe themselves and the world and the community of people around them. Mr
18 Vidino and Mr. Kohlmann will testify that jihad refers primarily to violent jihad, which
19 is traditionally understood to be the lesser jihad (lesser in importance).

20 Mr Vidino and Mr. Kohlmann will testify about tracking ISIS and other
21 contemporary terrorist movements, particularly over online media such as Twitter and
22 other communication platforms. Vidino and Kohlmann will testify about the nature of
23 online recruitment, communication platforms used, and communication techniques and
24 strategies. Vidino and Kohlman will testify about compartmentalization and the indirect
25 means of communication between U.S. foot soldiers ISIS members abroad.

26 Mr. Kohlmann may also be called to testify about a forensic examination of computer
27 equipment and cell phones in this case. Kohlmann may testify regarding the
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1 downloading of cell phone information from cell phones seized from the defendant and
2 his co-conspirators, computers, and digital media, including but not limited to hard
3 drives, CDs, DVDs, and GPS devices. Kohlmann may conduct a forensic analysis on the
4 computer/media storage devices and cell phone evidence obtained in this case and will
5 explain how he was able to obtain information, files and other stored data from the cell
6 phones and/or "SIM" cards associated with cell phones, as well as all digital media.

7 Kohlmann would then testify consistent with any reports he issues, as well as his
8 interpretations of the relevant computer evidence, including but not limited to the
9 following:

- 10 (a) The location, type, descriptions of relevant data found on the digital
11 media and cell phones;
- 12 (b) The process by which he forensically previews electronic devices,
13 media storage devices, computer hard drives, and cell phones;
- 14 (c) The process by which he makes a duplicate copy of the media
15 storage devices to insure that there are no changes made to the
16 originals;
- 17 (d) The process by which he completes his forensic analysis; and
- 18 (e) The process whereby users can delete or remove items from
19 electronic media.

20 Any additional reports drafted in this case will be promptly disclosed to defense.
21 The CVs' will be disclosed under separate cover.

22 Respectfully submitted this 12th day of November, 2015.

23 JOHN S. LEONARDO
24 United States Attorney
District of Arizona

25 *s/Kristen Brook* _____
26 KRISTEN BROOK
27 JOSEPH E. KOEHLER
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on the 12th day of November, 2015, I electronically filed the
3 foregoing with the Clerk of Court using the CM/ECF system, and that true and accurate
4 copies have been transmitted electronically to counsel for the defendant via the ECF
5 system.

6 **Daniel Maynard, Attorney for Defendant**

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